

BEFORE THE APPELLATE AUTHORITY
(Under the Right to Information Act, 2005)
SECURITIES AND EXCHANGE BOARD OF INDIA

Appeal No. 7016 of 2026

Neha Jain : Appellant

Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated July 05, 2026 (received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated August 03, 2026, responded to the application filed by the appellant. The appellant filed an appeal dated August 04, 2026 (Reg. No. SEBIH/A/E/26/00291). I have perused the application, the response of the respondent and the appeal and find that the matter can be decided based on the material available on record.
2. **Queries in the application** - The appellant, in her application, sought the following information:

“Subject: Request for Information regarding investigation against The Good Choice Enterprises Pvt. Ltd. (CIN: U52190RJ2007PTC024622)

I, Neha Jain, daughter of Sanjeev Kumar Jain, am an affected investor seeking information on behalf of my family regarding the illegal money collection scheme run by The Good Choice Enterprises Pvt. Ltd. Our family has lost a total of 6,30,000 (7 accounts of 90,000 each) to this fraudulent entity. As per the NCLT Jaipur Bench Order (Appeal No. 16/252(1)/JPR/2022), SEBI has already reported this company for illegal collection of public money. Please provide the following information under the RTI Act 2005:

- 1. What is the current status of SEBI investigation into the illegal money collection by The Good Choice Enterprises Pvt. Ltd. (CIN: U52190RJ2007PTC024622)?*
- 2. What specific actions have been taken to freeze the bank accounts or seize the assets of the company and its directors, Mr. Vimlesh Kumar Royal and Mr. Gursewak Singh Brar?*

3. *What is the procedure for investors to file for a refund of their principal amount from the recovered assets in this case?*
4. *Provide the name and contact details of the specific SEBI officer or department handling this investigation.*
5. *Provide a copy of the investigation report or any interim findings related to this case, if permissible under the Act. Details of the 7 Family Accounts (Total 6,30,000): -*

Neha Jain (ID: 510826, Receipt: 111534, Date: 21/09/2016) – Rashmi Jain (ID: 510822, Receipt: 111530, Date: 21/09/2016) - Sanjeev Kumar Jain (ID: 511060, Receipt: 111794, Date: 24/09/2016) - Manorma Jain (ID: 510827, Receipt: 111535, Date: 21/09/2016) - Jyoti Jain (ID: 510828, Receipt: 111536, Date: 21/09/2016) - Rajeev Jain (ID: 511061, Receipt: 111795, Date: 24/09/2016) - Sona Jain (ID: 510824, Receipt: 111532, Date: 21/09/2016)."

3. **Reply of the Respondent** – The respondent, in response to queries in the application, informed that the information sought is in the nature of seeking clarification/opinion. Accordingly, the same cannot be construed as “information”, as defined u/s 2(f) of the RTI Act.
4. **Ground of appeal** – The appellant has filed the appeal on the ground that she was refused access to information requested.
5. I have perused the application and the response provided thereto. On consideration, I find that the requested information is in the nature of seeking clarification/opinion from the respondent. I find that the said queries cannot be construed as seeking ‘information’ as defined under section 2(f) of the RTI Act. Consequently, the respondent did not have an obligation to provide such clarification or opinion under the RTI Act. In this context, reliance is placed on matter of *Azad Singh vs. CPIO, Oriental Insurance Company Limited* (order dated March 23, 2021) wherein Hon’ble Central Information Commission observed that “7. *The Commission, after hearing the submissions of both the parties and after perusal of records, observed that some queries of the appellant are in the nature of seeking explanation/ opinion/ advice/ confirmation/ clarification from the CPIO and he has expected that the CPIO firstly should analyze the documents and then provide information to the appellant. But the CPIO is not supposed to create information; or to interpret information; or to compile information as per the desire of the appellant under the ambit of the RTI Act. As per Section 2(f) of the RTI Act, the reasons/ opinions/ advices can only be provided to the applicants if it is available on record of the public authority. The CPIO cannot create information in the manner as sought by the appellant. The CPIO is only a communicator of information based on the records held in the office and hence, he cannot be expected to do research work to deduce anything from the material therein and then supply it to him.*” Accordingly, I do not find any deficiency in the response of the respondent.

6. In view of the above observations, I find that there is no need to interfere with the decision of the respondent.
The appeal is accordingly dismissed.

Place: Mumbai

Date: September 02, 2026

**RUCHI CHOJER
APPELLATE AUTHORITY UNDER THE RTI ACT
SECURITIES AND EXCHANGE BOARD OF INDIA**